

Dariusz Keyhani
Keyhani LLC
1050 30th Street NW
Washington, DC 20007
Telephone: (202) 748-8950
Fax: (202) 318-8958
dkeyhani@keyhanillc.com
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

-----X

ZEO Health Ltd.; Micah Portney;
Touchstone Life Essentials, Inc.; and
Norwood E. Stone,

Plaintiffs,

v.

ZOI Global, LLC; Lori R. Lee; Denise
Stephens; Metron Nutraceuticals, LLC;
and Nikolaos Tsirikos-Karapanos,

Defendants.

Case No.: 2:21-cv-11410
(ES)(JCB)

**NOTICE OF MOTION FOR
AN EXTENSION OF TIME TO
EFFECTUATE SERVICE ON
DEFENDANT ZOI GLOBAL,
LLC AND FOR
ALTERNATIVE SERVICE
VIA THE NEVADA
SECRETARY OF STATE**

Return Date: November 12, 2021

***ORAL ARGUMENT
REQUESTED***

-----X

TO: Paul S. Danner
GOLDBERG SEGALLA LLP
1037 Raymond Blvd., Suite 1010
Newark, New Jersey 07072
Phone: (973) 681-7000
Fax: (973) 681-7101
Attorneys for Defendant
Lori R. Lee

Colin Hackett
LEWIS BRISBOIS BISGAARD & SMITH

One Riverfront Plaza, Suite 800
Newark, NJ 07102
Tel. 973.577.6260
Colin.Hackett@lewisbrisbois.com
*Counsel for Defendants, Metron Nutraceuticals,
LLC and Nikolaos Tsirikos-Karapanos*

PLEASE TAKE NOTICE that on December 6, 2021, at 10:00 a.m. or soon thereafter as counsel may be heard, Plaintiffs will move this Court for an Order extending the time for service of process on Defendant Zoi Global and permitting alternative service via the Nevada Secretary of State pursuant to N.J. Ct. R. 4:4-4(b)(1).

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, Plaintiffs rely upon the accompanying Declaration of Anya Engel, the exhibits annexed thereto, as well as the memorandum of law in support submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is included and *oral argument is requested*.

Dated: November 12, 2021

Respectfully submitted,

s/ Dariush Keyhani
Dariush Keyhani
Keyhani LLC
1050 30th Street NW
Washington, DC 20007
Telephone: (202) 748-8950
Fax: (202) 318-8958
dkeyhani@keyhanillc.com
Attorneys for Plaintiff